Certified Access Specialist Program
Staff Report 2.2
CERTIFICATION CLASSIFICATIONS OF ACCESS SPECIALISTS

April 30, 2004

EXECUTIVE SUMMARY

Staff Report 2.1, *Professional Scope of the Certified Access Specialist Program,* instructs the Implementation Committee to consider four professional *specialties* as it develops certification criteria for access specialists. This report first considers whether all access specialists receive identical certification, or else classify certification to reflect these professional specialties in disability access.

The strategic decision to create distinct classifications of certification provides the flexibility required to tailor certification criteria to match each professional specialty in the Certified Access Specialist program (CASp). It would also expand the pool of candidates for certification. For example, the determinination of prerequisite qualifications of applicants to each specialty would result in a variety of acceptable avenues of professional preparation. Another advantage is the efficiency resulting from identifying general requirements, or *base criteria,* that would apply to all classifications. The use of base criteria would allow efficient development, and succinct documentation of many aspects of the program, such as a code of ethics and performance standard*s.*

Staff proposes further differentiation within each classification into two *competency levels* which would recognize the accomplishments and expertise of senior specialists. Such distinction provides a number of benefits to program development, for clients, specialists and program governance. Discussion concludes with an argument in favor of certification classifications from the consumer's point of view.

After presenting three alternatives similar to those of the previous staff report, the conclusion of this report consists of structured recommendations to the Implementation Committee to implement the third alternative. Two classifications will replicate the requirements of existing certification programs for two specialties of plan review and construction inspection. A third classification will combine the specialty of facilitating the assertion rights with that for the work of ADA coordinators. These recommendations differentiate the professional roles and duties of each classification from those of the other two, allowing for subsequent differentiation of certification criteria.

RECOMMENDATIONS

2.2.1. Create multiple classifications for certification, in order to differentiate certification criteria for each specialty in CASp, as follows:

2.2.2. Create a classification for the specialty of preparing and/or reviewing accessibility requirements of construction documents.

2.2.3. Create a classification for the specialty of inspecting the construction of accessible features, to verify completion and correctness.

2.2.4. Create a classification for the specialty of facilitating the assertion of accessibility rights in

the built environment by persons with disabilities.

2.2.5.   Each specialist is to be certified, at either of two levels of competence, corresponding to that of an entry-level professional and that of an accomplished expert in the field. Criteria for assigning competency levels are deferred to deliberations of related certification criteria.

RESEARCH METHODOLOGY

In considering the general issue of professional certification, staff found a number of useful concepts in the preface to *The Guide to National Professional Certification Programs.*[1] This paper cites several instructive guidelines from a publication on establishing new certification programs by the Council of Engineering and Scientific Specialty Boards (CESB)[2].

A thorough analysis of the authority granted in the legislation to establish CASp[3] preceded a search for model programs in disability access. The Texas Architectural Barriers Program administers the only government program in disability compliance [4]. Staff examined regulations and procedures for its specialist classifications, which it refers to as "endorsements." Staff was also able to query an on-line database of Texas Registered Accessibility Specialists[5] for statistical information related to each type of endorsement.

Staff next attempted to find model certification programs administered by the State of California. On the Homepage for the State of California is a link to "Professional Licensing," which leads to a listing by the Department of Consumer Affairs of all regulated occupations requiring either licensing, registration or certification[6]. Certification programs exist for the occupations of Certified Shorthand Reporter and Certified Teacher only. A modest number of registration programs are listed, but the vast majority are licensed occupations.

Research utilizing Internet search engines of state websites, for the keyword "certification" produced unexpectedly poor results. In the Business and Professions Code, and to a lesser extent in other Codes, there are references to the need for certification by someone in a *licensed* activity, followed by a statement that the state does not provide such certification. The Department of Industrial Relations administers the only certification program found, as part of the Division of Apprenticeship Standards:

> The Division of Apprenticeship Standards (DAS) administers California apprenticeship law and enforces apprenticeship standards for wages, hours, working conditions and the specific skills required for state certification as a journeyperson in an apprenticeable occupation. DAS promotes apprenticeship training, consults with program sponsors, and monitors programs to ensure high standards for on-the-job training and supplemental classroom instruction.[7]

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[1] *The Guide to National Professional Certification Programs.* HRD Press. Amherst, Massachusetts

[2] *Guidelines for Engineering and Related Specialty Certification Programs.* CESB: Annapolis, MD.

[3] California Senate Bill 262, Chapter 872, Statutes of 2003.

[4] Texas Department of Licensing and Regulation: Austin, TX: http://www.license.state.tx.us/ab/ab.htm

[5] Texas Department of Licensing and Regulation: Austin, TX: http://www.license.state.tx.us/LicenseSearch/, using LicenseType = "Registered Accessibility Specialist"

[6] California Department of Consumer Afffairs: http://www2.dca.ca.gov/pls/wllpub/wllquery$.startup

[7] California Department of Industrial Relations: http://www.dir.ca.gov/apprenticeship.html

The search for model programs concluded with case studies of established certification programs administered by professional organizations. Two programs are worthy of review, based on similarities in professional endeavor and scope of certification. The first program, administered by the Institute of Professional Environmental Practice (IPEP), provides certification on two competency levels for four *specific practice areas* (i.e. classifications) of environmental management.[12] The second organization, The Council on Certification of Health, Environmental and Safety Technologists (CCHEST), administers several certification programs in occupational safety, with focus on the Certified Safety Professional program.[13]

DISCUSSION

The following passage on professional certification indirectly suggests a methodology to categorize the professional work of access specialists:

> Professional certification is the voluntary mechanism for validating professional *knowledge* and *expertise* in a *specialty*. Voluntary professional certification can set *standards* and lead to *quality* for *specific skills* needed to perform a *specific task* or role. Certification allows others to aspire to this standard and quality and be recognized as skilled professionals.[14]

This passage focuses on the process to certify those with the same expertise, in order to recognize their profession as unique. Key descriptors (shown in italics in the passage) used initially uniquely characterize the profession, may be applied to differentiate specialization within the profession. Evaluation of these key descriptors would be instrumental in differentiating specialties in CASp, resulting in identification of the *professional knowledge and expertise* required in each specialty classification.

Competency Levels

Within each classification, certification at a competency level affords the opportunity to refine performance standards and restrict professional duties.   For the sake of discussion, two levels (*junior* and *senior*) will be used.   Staff forsees the involvement of senior specialists in the governance of CASp: for quality control, investigation of complaints of specialist performance, and their participation in disciplinary or appeal processes. Equally plausible is the involvement of senior specialists in the professional development of their colleagues: as mentors to entering professionals, or participation in continuing education or recertification.   Existing professional certification programs have similar expectations of senior members; for example, mentoring is an ongoing service in CCHEST, and IPEP recognizes certification at the intern level.

Two incentives encourage certification at the senior competency level. Coveted professional roles could be restricted to senior members only. Examples include design collaboration and/or plan review of the largest or most complicated projects, and for service as expert witnesses. Clients for

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[12] IPEP: Pittsburgh, PA. http://www.ipep.org

[13] CCHEST: Savoy, IL. http://www.cchest.org

[14] Excerpted from the Preface to *The Guide to National Professional Certification Programs*. HRD Press. Amherst, Massachusetts

these services would likewise seek only the most highly qualified specialists. The second incentive is driven by perceived advantages in marketing professional services. Senior members may emphasize their level of accomplishment when competing for consultancies open to both competency levels.

The following guideline on establishing certification programs suggests a method to designate charter members of CASp at a senior competency level:

> For a period not to exceed twelve months after the date of recognition of the program, newly recognized certification programs may grant certification to individuals on the basis of eminence or extensive education and/or experience without examination (i.e. by grandfathering). After that time, no individual shall be certified other than by examination.[15]

This concept may be adapted to initially certify selected access specialists at the senior competency level, not to exceed a certain percentage of those listed as certified on the first annual posting for CASp

The Consumer's Perspective

The decision to create classifications of certification should consider the public's impression of certified access specialists. CESB asserts a relevant principle in its guideline section titled "Responsibilities to the Public and Consumers":

> Insure that any title or credential awarded by the credentialing body accurately reflects the specialty area.[16]

Consumers should get the professional services they expect, period.

ALTERNATIVES

Staff considers three alternatives as viable strategies to organize certification critera for CASp: (1) establish the program without certification classifications; (2) replicate the classifications of existing programs in disability access; and (3) divide certification into classifications to enable differentiation of certification criteria for the four specialties of access specialists.

Alternative One: The advantage of establishing a program without certification classifications is its simplicity. There would be no consideration of differences in required skills or allied professional preparation in certification. Although plausible, staff feels this alternative is deficient and will restrict proper program development.

Alternative Two: This alternative would be based on conformance, by creating classifications that replicate, as much as possible, the specialist roles and duties in two existing programs in disability access. Review of the certification examination for access specialists, administered by ICC , and of the administration of Registered Accessibility Specialists (RAS) in Texas reveal two classifications for access specialists:

1. to review construction drawings of proposed construction for compliance with access requirements, and

2. to inspect such construction to verify its completion and correctness.

Staff feels that although these classifications are non-controversial in the discipline of disability access, there have evolved specialties in the professions whose expertise and preparation do not align with either of these classifications.

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[15] *Guidelines for Engineering and Related Specialty Certification Programs.* CESB: Annapolis, MD.
[16] *Guidelines for Engineering and Related Specialty Certification Programs.* CESB: Annapolis, MD.

Alternative Three: begins by including the second. It would create one or more additional classifications to incorporate all four of the specialties described in Staff Report 2.1, *Professional Scope of the Certified Access Specialist Program*:

1. Preparation and/or review of accessibility requirements in construction drawings.

2. Inspection of the construction of accessible features, for verifying completion and correctness.

3. A variety of activities which facilitate the assertion of disability rights, including but not limited to:

    a. Preparation of facility surveys, self-evaluations and transition plans.

    b. Proactive feedback and advice, as an ombudsperson, on behalf of persons who believe they have been denied access to a facility.

    c. The monitoring of corrective work specified in stipulated court judgments.

4. ADA Coordinators for government agencies, and similar roles for public accommodations.

As in the second alternative, classifications for the first two specialties should attempt to not be in conflict with existing certification criteria of the ICC and the Texas RAS programs. The remaining two specialties have evolved with ADA, involving persons on both *sides of the counter* working to resolve access problems. Staff proposes to establish a third classification to recognize the evolving specialties. Certification in this classification is for specialists who assert and facilitate the rights of persons with disabilities. The third alternative classifies certification such that the professional roles and duties in each classification is distinctly different from the other two, allowing for subsequent differentiation of certification criteria.

IMPLEMENTATION

This paper will be reviewed consistently with all staff reports for the Certified Access Specialist program. Comments from senior staff of the Office of Universal Design will be incorporated into draft versions before forwarding to the State Architect for final review, leading to his approval for distribution to the CASp Implementation Committee for consideration at its next meeting.